

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF RICHMOND

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K.B. . BY HER MOTHER,  
SAKIA HALL AS NEXT FRIEND,  
and  
SAKIA HALL

Plaintiffs,

vs.

Case No.:  
CL10-3675-00

HAROLD FORD

Defendant.  
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DEPOSITION OF SAKIA HALL

May 20, 2011

12:40 p.m.

Taken at:

THE CITY ATTORNEY'S OFFICE  
900 East Broad Street, Room 300  
Richmond, Virginia 23219

REPORTED BY: HELEN B. YARBROUGH, RPR, CCR, CLR

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(804)359-1984

1           **A     Yes.**

2           **Q     And you're living -- just you and K.B.?**

3           **A     Yes.**

4           **Q     And at that point K.B. is three years old?**

5           **A     Yes.**

6           **Q     And how was she doing in terms of her**  
7 **behavior?**

8           **A     K.B. was always hyper from a baby. She was**  
9 **a little active, a little more active than other kids.**

10          **Q     What do you mean by "more active than other**  
11 **kids"?**

12          **A     She had a lot of energy, a lot of energy to**  
13 **burn.**

14          **Q     And how would that show itself?**

15          **A     She just liked to play.**

16          **Q     By the time you moved here in October of**  
17 **2004, did she have a counselor of any sort?**

18          **A     No.**

19          **Q     Did she have any medication that she was**  
20 **taking?**

21          **A     No. She just started when she got in the**  
22 **third grade -- no, the second grade -- no -- yeah, the**  
23 **second grade, they started medication.**

24          **Q     From October 2004, did you find any work,**  
25 **and did you work while you were in Richmond?**

1           **A     Yes.**

2           **Q     What were you receiving?**

3           **A     I think just food stamps and Medicaid.**

4           **Q     So you had food stamps, Medicaid, and you**  
5 **were living in the Richmond Redevelopment Housing**  
6 **Authority; is that correct?**

7           **A     Uh-huh.**

8           **Q     Did you have any bills?**

9           **A     No, not really. Just my rent. That was \$50**  
10 **while I was working.**

11          **Q     You said about K.B., when we were getting**  
12 **there, that she started medication in the**  
13 **second grade; is that right?**

14          **A     Yes.**

15          **Q     Before she started medication, had she been**  
16 **having some behavior problems?**

17          **A     No. No. She's just a regular kid. That's**  
18 **just her. That's the way she is. Some people can**  
19 **handle her. Some people, if they have patience, they**  
20 **can handle her. If you want to spend time, you can do**  
21 **that with her. If you don't, then you're going to be**  
22 **stressed out. That's the way it is. But she's not**  
23 **bad. She's very smart. She's just a little hyper.**

24          **Q     Did she have temper tantrums?**

25          **A     Yes. She's the only child.**

1 Q What does that mean?

2 A She's spoiled.

3 Q What does her temper tantrum look like?

4 A Crying and falling out.

5 Q What does "falling out" mean?

6 A Falling down on the floor, crying.

7 Q Like, lay down on her back?

8 A Yeah, sometimes.

9 Q Lay on her stomach?

10 A Like, in the supermarket, you see kids, they  
11 want something, they can't get it, you don't have  
12 enough money, they start crying, they fall out and all  
13 this stuff like that.

14 Q Okay. How often would she have those temper  
15 tantrums.

16 A When I don't have it.

17 Q Whenever she didn't get what she wanted?

18 A Uh-huh.

19 Q Is that "yes"?

20 A Yes.

21 Q That was true in the second grade, that she  
22 would still have temper tantrums?

23 A Yes. She was breaking out of it slowly,  
24 because she be around other kids and first time going  
25 to school, and that's when she started kindergarten

1           A     I'm sure. I don't know if she did in  
2           second grade, but I know the third.

3           Q     Third grade, she had a counselor at school  
4           and a counselor at home?

5           A     Yes.

6           Q     When did she first have a counselor at home?

7           A     I'm not even sure.

8           Q     What was her understanding of why she had a  
9           counselor at home?

10          A     That she -- like I just told you, she's  
11          active and she needs to focus. So the medicine was  
12          making her do -- she was doing fine way before that  
13          incident happened and everything. She was fine. She  
14          was fine that day.

15          Q     Here's my question: What was your  
16          understanding of why she had a counselor at home in  
17          the third grade?

18          A     I'm not even sure. They just asked me did I  
19          want an inside counselor. It was my choice, and I  
20          just said yes -- somebody else to work with her so she  
21          would be more better at school.

22          Q     Was that Ms. Worsham, the home counselor?

23          A     Yeah.

24          Q     How often did Ms. Worsham spend time with  
25          Kyss at home?

1       they work together, but they're not in the same  
2       office.

3               Q       Is that Richmond Behavioral Health?

4               A       Yes. And that's when they diagnosed that  
5       she had ADHD.

6               Q       So K.B. actually went to Richmond Behavioral  
7       Health and was given some tests or something?

8               A       No. It's like, I guess, the doctor or  
9       whatever just asked her questions and asked her how  
10      she feel and everything like that.

11              Q       And your understanding was that they  
12      diagnosed her with ADHD?

13              A       Yes.

14              Q       Okay. After she was diagnosed with ADHD,  
15      was she put on some medication?

16              A       Yes. She was on a couple of them. I do not  
17      know the name of them because it sound crazy, half of  
18      them. But most of them had side effects that I did  
19      not like. Some of them made her, like, a zombie; some  
20      of them, she had dry mouth; she wouldn't eat; she said  
21      her stomach hurt, head hurt, stuff like that. So I  
22      had to keep changing, trying to find something better.

23                      And the last one she took, she said that it  
24      was making her have bad side effects. So she was  
25      going to get different medicine, so I just took her

1 Q Was she crying?

2 A Yes. She said she's tired of people keep  
3 asking her the same questions over and over again.

4 Q What does that mean?

5 A Like, my mom and my sister, they're just  
6 trying to find out; like, "What's wrong? What's going  
7 on, [redacted]. Tell us what happened." Like, she was like  
8 she was tired of talking about it and whatever. When  
9 that happened, she had lines on her arms from the  
10 cuffs being too tight on her arms.

11 Q Where were the lines? On her wrists?

12 A Going across her wrists.

13 Q I saw in your interrogatory answers that  
14 there were no -- she did not get any medical  
15 treatment, though?

16 A No.

17 Q And still to this day, she's never been to  
18 see a doctor or anybody about this?

19 A No.

20 Q Does she have counselors at school or at  
21 home up in New Jersey?

22 A Yes, she has a counselor.

23 Q At school or home or --

24 A At school.

25 Q Why does she have that counselor at school?